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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

12 IN RE: SOCIAL MEDIA ADOLESCENT
13 ADDICTION/PERSONAL INJURY
14 PRODUCTS LIABILITY LITIGATION
15
16 THIS DOCUMENT RELATES TO:
17 ALL ACTIONS

MDL No. 3047
Case No. 4:22-md-03047-YGR

**DECLARATION OF CHARLOTTE
ALTER IN SUPPORT OF MOTION TO
INTERVENE AND PROTECT ACCESS**

Judge: Hon. Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang

Hearing:

Date: October 21, 2025
Time: 2:00 p.m.
Place: Courtroom 1, Fourth Floor

1 I, Charlotte Alter, declare as follows:

2 1. I am an award-winning journalist and a Senior Correspondent at TIME, a global
 3 media brand and one of the oldest and most well-recognized weekly newsmagazines in America.
 4 With more than 15 million print readers and more than 50 million followers across social media
 5 channels, TIME is a critical source of information for the public. It is owned and operated by
 6 TIME USA, LLC.

7 2. Over the course of my 12-year career at TIME, I have written 18 cover stories and
 8 won numerous awards. I have won, amongst other awards, three Newswomen's Club Awards —
 9 including for best feature and best political reporting — and a GLAAD Award. I am also the
 10 author of *The Ones We've Been Waiting For: How a New Generation of Leadership Will*
 11 *Transform America* (2020), a book that chronicles the rise of a new generation of millennial
 12 politicians. I am a general-assignment reporter. My assignments have included presidential
 13 elections, Covid, youth activism around climate change, and gun violence. I appear regularly on
 14 television to discuss my reporting.

15 3. For most of the last year, my coverage has focused on the impact of social media
 16 on kids and teenagers.¹ My sustained beat coverage has included stories that address the
 17 allegations at issue in this MDL.

18 4. For example, on August 20, 2025, TIME published my story titled, ““Everything I
 19 Learned About Suicide, I Learned On Instagram.””² As the article states, the eponymous quote
 20 came from MDL Plaintiff Taylor Little who first attempted suicide at age 13 after consuming self-
 21 harm content on social media. This article also covered studies finding mental-health risks from
 22

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24 ¹ E.g. Charlotte Alter, *She Says Social-Media Algorithms Led to Her Eating Disorder. Now She's*
 25 *Suing TikTok and Instagram*, TIME (June 18, 2025, at 4:00 AM PT),
<https://time.com/7295323/social-media-case-instagram-tiktok/> (reporting on this multi-district
 26 litigation); Charlotte Alter, *Inside the Parent-Led Movement For Phone-Free Schools*, TIME
 27 (Aug. 4, 2025, at 4:00 AM PT), <https://time.com/7307163/parent-movement-phone-free-schools/>
 (covering legislative reform efforts to curb youth phone addiction).

28 ² Charlotte Alter, *'Everything I Learned About Suicide, I Learned On Instagram.'*, TIME (Aug.
 20, 2025, at 4:00 AM PT), <https://time.com/7310444/instagram-lawsuit-self-harm/>.

1 teen social-media use, a whistleblower's attempt to address these risks inside Meta, and other
 2 MDL Plaintiffs' allegations.

3 5. TIME helps shape the national narrative about the impact of social media use on
 4 public health, and especially the health of minors, through consistent beat coverage with fact-
 5 based reporting and analysis.

6 6. TIME regularly relies on access to public documents, including court records, in its
 7 reporting. We have a demonstrated commitment to protecting freedom of the press and demanding
 8 government transparency. For example, on May 1, 2025, Time joined the One Free Press
 9 Coalition in publishing a list of the ten most urgent threats to press freedom around the world,
 10 bringing attention to fellow journalists who are being imprisoned for seeking to tell the truth.³

11 7. I believe that accessing the evidence subject to protective order that is filed in
 12 support or opposition to dispositive and *Daubert* motions in this litigation will likely further my
 13 ability to report on this litigation specifically and the health impacts of social-media use on
 14 children more generally, including any actions taken by social media companies to induce or
 15 prevent such harms.

16

17 I declare under penalty of perjury under the laws of the United States of America that the
 18 foregoing is true and correct. Executed this 16th day of September, 2025, at Brooklyn, New York.

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CHARLOTTE ALTER

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 28 ³ One Free Press Coalition, *The Most Urgent Threats to Press Freedom Around the World*, TIME
 (May 1, 2025, at 6:13 AM ET),